IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI NORTHERN DIVISION

MICHAEL COREY JENKINS AND EDDIE TERRELL **PARKER**

PLAINTIFFS

VS.

CIVIL ACTION NO.: 3:23-cv-00374-DPJ-FKB

RANKIN COUNTY, MISSISSIPPI, ET AL.

DEFENDANTS

THE CITY OF RICHLAND'S MOTION TO DISMISS OR, ALTERNATIVELY, FOR **SUMMARY JUDGMENT**

The City of Richland moves to dismiss Plaintiffs Michael Corey Jenkins' and Eddie Terrell Parker's ("Plaintiffs") Complaint pursuant to Federal Rules of Civil Procedure 12(b)(6) or, alternatively, pursuant to Federal Rule of Civil Procedure 56. The contemporaneously filed memorandum in support explains in detail the bases for the requested relief, including that

In addition to the memorandum, the City offers the following exhibits in support:

Exhibit "A" – Board Minutes

Plaintiffs' claims fail on the merits.

Exhibit "B" – Resignation Letter

Exhibit "C" – Board of Standards & Training Termination Form

For the reasons articulated in the memorandum, the City respectfully requests an order of dismissal.

Dated: February 1, 2024

Respectfully submitted,

PHELPS DUNBAR, LLP

BY: /s/ Mallory K. Bland

G. Todd Butler, MS Bar #102907 Mallory K. Bland, MS Bar #105665 4270 I-55 North Jackson, Mississippi 39211-6391

Post Office Box 16114

Jackson, Mississippi 39236-6114

Telephone: 601-352-2300 Telecopier: 601-360-9777 Email: todd.butler@phelps.com Email: mallory.bland@phelps.com

ATTORNEYS FOR THE CITY OF **RICHLAND**

CERTIFICATE OF SERVICE

I certify that, on February 1, 2024, I had a copy of this document electronically filed with the Clerk of the Court, using the CM/ECF system, which sent notification of such filing to all counsel of record.

/s/ Mallory K. Bland Mallory K. Bland